

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE:</b>	§	
<b>JULIET HOMES, LP,</b>	§	<b>Case No. 07-36424-H1-7</b>
<b>Debtor</b>	§	<b>(Chapter 7)</b>

<b>IN RE:</b>	§	
<b>JULIET GP, LLC,</b>	§	<b>Case No. 07-36426-H1-7</b>
<b>Debtor</b>	§	<b>(Chapter 7)</b>

<b>IN RE:</b>	§	
<b>DOUGLAS A. BROWN,</b>	§	<b>Case No. 07-36422-H1-7</b>
<b>Debtor.</b>	§	<b>(Chapter 7)</b>

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<b>JOSEPH M. HILL, TRUSTEE</b>	§	
<b>AND W. STEVE SMITH, TRUSTEE,</b>	§	<b>Civil Action No. H-12-840</b>
<b>Plaintiffs</b>	§	<b>Adversary No. 09-03429</b>
<b>v.</b>	§	<b>Adversary No. 09-03441</b>
	§	<b>Adversary No. 09-03442</b>
<b>ALEX ORIA ET AL.,</b>	§	
<b>Defendants</b>	§	

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**NOTICE OF DISMISSAL OF CAROLINE BROWN, CONNIE BROWN,**  
**EUGENIO A. AGUILAR, JAMES COUNCE, VIRGIL WAGGONER, TOWN CREEK**  
**PARTNERS, AND PINNACLE TITLE COMPANY AND**  
**STIPULATION OF DISMISSAL OF RAVI REDDY**

Plaintiffs Joseph M. Hill, Chapter 7 Trustee of the estates of Juliet Homes, LP and Juliet GP, LLC, and Janet S. Northrup, Chapter 7 Trustee of the estate of Douglas Allen Brown, file this (i) Notice of Dismissal of Caroline Brown, Connie Brown, Eugenio A. Aguilar, James Counce, Virgil Waggoner, Town Creek Partners, and Pinnacle Title Company, and (ii) Stipulation of Dismissal of Ravi Reddy, showing as follows:

1. This civil action is the consolidated case of twelve Adversary Proceedings commenced in late October 2009, the reference of which was withdrawn by this Court.<sup>1</sup> Plaintiffs named more than 75 defendants in their complaints.

2. In their original and amended complaints, Plaintiffs named Caroline Brown, Connie Brown, Eugenio Aguilar, James Counce, Virgil Waggoner, Town Creek Partners, Pinnacle Title Company, and Ravi Reddy as defendants because Debtors' books showed multiple transfers to each of them or their agents.

3. Defendants Caroline Brown and Eugenio Aguilar have filed bankruptcy cases in which Caroline Brown disposed of Plaintiffs' claims against them through a discharge and Eugenio Aguilar disposed of Plaintiffs' claims through confirmation of a plan that provided for no payment on Plaintiffs' disputed claim. Accordingly, dismissal of Plaintiffs' claims against these defendants is required.

4. Upon further investigation of Plaintiffs' claims against Connie Brown, James Counce, Virgil Waggoner, Town Creek Partners, Pinnacle Title Company, and Ravi Reddy, Plaintiffs have determined that they no longer desire to prosecute those claims.

5. Caroline Brown, Connie Brown, Eugenio Aguilar, James Counce, Virgil Waggoner, Town Creek Partners, and Pinnacle Title Company have not filed an answer to Trustees' complaints or a motion for summary judgment.

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<sup>1</sup> Adv. Nos. 09-3429, 09-3432, 09-3433, 09-3434, 09-3435, 09-3436, 09-3437, 09-3438, 09-3439, 09-3440, 09-3441, and 09-3442 were consolidated into Adv. No. 09-3429. On March 14, 2012, Bankruptcy Judge Marvin Isgur recommended the withdrawal of the reference, and this Civil Action No. H-12-840 is the District Court suit that resulted from the withdrawal of the reference.

6. Ravi Reddy has filed an answer to Trustees' complaint, but stipulates to this dismissal as reflected by his counsel's signature.

7. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i) and (ii), Plaintiffs file this Notice of Dismissal and Stipulation of Dismissal and request that the Clerk of the Court reflect the dismissal of Plaintiffs' claims against these defendants.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs request that the Clerk of the Court reflect Plaintiffs' dismissal of Caroline Brown, Connie Brown, Eugenio Aguilar, James Counce, Virgil Waggoner, Town Creek Partners, Pinnacle Title Company, and Ravi Reddy from this consolidated action and grant them such other and further relief to which they may be justly entitled.

Date: September 19, 2014

Respectfully submitted,

/s/ Susan Hardie Jacks

Susan Hardie Jacks

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this Notice of Dismissal was served on September 19, 2014, electronically on those persons who receive electronic notification from the court, and by U.S. Mail, on all others, as indicated below:

/s/ Jeremy R. Stone

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